

# WILLKIE FARR & GALLAGHER LLP

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July 26, 2019

**VIA ECF**

Honorable Dennis Montali  
United States Bankruptcy Court  
Northern District of California  
450 Golden Gate Avenue, 16th Floor  
San Francisco, CA 94102

*Re: In re PG&E Corporation and Pacific Gas and Electric Company, Case No. 19-30088 (DM)  
(Jointly Administered)*

Dear Judge Montali:

I write on behalf of the Ad Hoc Group of Subrogation Claim Holders (the “Ad Hoc Subrogation Group”). Earlier today, the Official Committee of Tort Claimants (the “TCC”) filed a letter with this Court [Docket No. 3219] requesting a status conference regarding discovery related to the wildfire claims, which have been stayed since the Debtors filed their bankruptcy petitions. Although various discovery issues remain open and unresolved, the Debtors now seek to have the claims of individual plaintiffs and subrogation claim holders estimated by this Court, including but not limited to claims related to the Tubbs Fire, beginning in October. As a result, it is imperative that discovery begin immediately.

In addition, on July 23, 2019, we received notice that the Debtors intend to move forward with the inspection of certain physical evidence related to the wildfires, even though they are relying on the automatic stay to prevent other relevant discovery. This further indicates the need for opening discovery into all relevant matters at this time, including additional physical evidence in the Debtors’ possession.

Much if not all of the discovery sought from the Debtors by the individual plaintiffs is equally relevant to the claims asserted by the Ad Hoc Subrogation Group. Accordingly, the Ad Hoc Subrogation Group joins in the TCC’s request for a conference with the Court to discuss open discovery issues.

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Sincerely,

/s/ Benjamin P. McCallen

Benjamin P. McCallen

cc: Kevin J. Orsini, counsel for the Debtors, via email  
Thomas R. Kreller, counsel for the Official Committee of Unsecured Creditors, via email  
All parties via ECF